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NSA CRANE
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EMAIL AND THE U S EPA REGION V COMMENTS ON THE DRAFT FINAL INTERIM
MEASURES REPORT AT UNEXPLODED ORDNANCE 07 (UXO 07) NSA CRANE IN
05/11/2015
U S EPA REGION V CHICAGO IL

Cohen, Deborah

From: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Sent: Monday, May 11, 2015 9:52 AM
To: Cole, Linda L CIV NAVFAC MIDLANT, IPTNE; dgriffin@idem.in.gov
Cc: Brent, Thomas CIV NAVFAC MIDLANT, PWD Crane; Cohen, Deborah
Subject: RE: IMR_UXO7_Draft Final N62470-08-D-1008/F271

Tom/Linda,

Comments on UXO 7 IMR:

- 1) Please provide the post-removal UCL calculations in the report.
- 2) Add a section or discussion of data quality to the report and provide some explanation for the "M" data qualifier - manual integration.
- 3) It's not clear how the conclusion (page 4-3) of unacceptable ecological risks was derived. For lead, the report states (top of page 4-2) that the average soil lead concentration was 191 mg/kg. Please identify or provide information on the calculation of this value. The report does not provide an ecological screening value (MCG) for PAHs. I recommend the Navy use the PAH screening values (both low and high molecular weight) from the EPA Ecological Soil Screening Levels Report.

Let us know if you have questions.

Thanks,
Pete

-----Original Message-----

From: Cole, Linda L CIV NAVFAC MIDLANT, IPTNE [mailto:linda.cole@navy.mil]
Sent: Tuesday, May 05, 2015 6:18 AM
To: Ramanauskas, Peter; dgriffin@idem.in.gov
Cc: Brent, Thomas CIV NAVFAC MIDLANT, PWD Crane; Cohen, Deborah; Cole, Linda L CIV NAVFAC MIDLANT, IPTNE
Subject: IMR_UXO7_Draft Final N62470-08-D-1008/F271

Pete,

BLUF: We're running out of time and money to address work that has been outstanding for years at Navy request. So I'd like us to consider some risk management decisions.

I wanted to do a quick check-in on the IMR for UXO7. Tom sent it to you on 1/9/2015 for review and comment. We are looking to document NFA with this document. The IM (2014) removed risks to ecological receptors and future residents for exposure to surface soil.

Tom asked in an email from 4/3/2015 about finalizing the RFI_UXO7. My records indicate that the RFI documenting ecological and HH risk was finalized in July 2009 and uploaded into the NIRIS dB as a final document. My records also indicate that an RFI Addendum_UXO7_Draft_2012Dec was submitted to the Navy for comment but was never reviewed and therefore never provided to EPA for review and comment. You asked in an email to Tom on 4/3/2015 about finalizing the RFI Addendum. I did not intend to issue the RFI Addendum but to let the IMR run the issue to ground.

Since the IMR re-evaluated risks documented in the July 2009 RFI that remain at the site after the IM was completed, the IMR is adequate to document NFA necessary without modifications to the RFI.

Once EPA comments have been adequately resolved, the workload sharing plan is to transfer the remaining work to IDEM.

Doug,

If EPA concurs that the IMR adequately documents NFA for UXO7, would a Statement of Basis be required or can NFA be documented through permit modification?

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